

1 Jason Kuller, NV Bar No. 12244  
 2 Rachel Mariner, NV Bar No. 16728  
 3 Shay Digenen, NV Bar No. 16397  
**RAFII & ASSOCIATES, P.C.**  
 4 1120 N. Town Center Dr., Suite 130  
 Las Vegas, Nevada 89144  
 5 Phone: 725.245.6056  
 Fax: 725.220.1802  
 6 [jason@rafilaw.com](mailto:jason@rafilaw.com)  
[rachel@rafilaw.com](mailto:rachel@rafilaw.com)  
[shay@rafilaw.com](mailto:shay@rafilaw.com)  
*Attorneys for Plaintiffs*

7  
 8 **UNITED STATES DISTRICT COURT**  
 9  
**DISTRICT OF NEVADA**

10 CHRISTINA CANTU and REBEKAH  
 11 SVINNING, on behalf of themselves and all others  
 similarly situated,

12 Plaintiffs,  
 13 v.

14 THOMPSON MICHIE ASSOCIATES, LLC, a  
 15 foreign limited liability company; TM EQUITIES  
 INC., f/k/a THOMPSON MICHIE ASSOCIATES,  
 INC., a foreign corporation; and DOES 1 through  
 16 50, inclusive,

17 Defendants.

Case No.: 2:24-CV-00908-APG-DJA

**STIPULATION TO EXTEND DEADLINE  
 FOR THE PARTIES TO SUBMIT A  
 PROPOSED DISCOVERY PLAN AND  
 SCHEDULING ORDER**

[Second Request]

18  
 19 IT IS HEREBY STIPULATED by and between Plaintiffs Christina Cantu and Rebekah Svinning  
 20 (“Plaintiffs”), and Defendant TM Equities Inc (“TME”), and Thompson Michie Associates, LLC (“TMA,”  
 21 and together with TME, “Defendants”) (collectively “Parties”), through their respective counsel, to extend  
 22 the current deadline for the Parties to file a proposed Discovery Plan and Scheduling Order (“DPSO”) one  
 23 week, from June 21, 2024, to June 28, 2024. This is the Parties’ second request for an extension on the  
 24 deadline to file a proposed DPSO.

25 1. On June 20, 2024, the Parties conducted their conference on a proposed DPSO pursuant to  
 26 FRCP 26(f).

27 2. During the conference, the Parties discussed for the first time the prospect of tolling  
 28 Plaintiffs’ claims while the Parties pursued alternative dispute resolution. After discussing names of



1 mediators and other particulars, the Parties agreed – in principle – to stay all case deadlines while the Parties  
2 explored possible early resolution of this dispute through mediation.

3. The Parties expected to be able to file a stipulated stay of all case deadlines today – in lieu  
4 of their proposed DPSO. Unfortunately, the Parties have been unable to agree on all the terms of a stay, or  
5 the terms of a tolling agreement pending any stay. The Parties need additional time to negotiate these terms  
6 and, if they are unable to agree, they will submit their proposed DPSO next week.

7. The Parties have therefore agreed to extend the deadline for filing their DPSO one week until  
8 June 28, 2024.

5. The Parties further agree that they are not waiving, relinquishing, or otherwise impairing any  
10 claim, defense, or other right they may have by virtue of entering this Stipulation.

6. This request is made in good faith and not for the purpose of delay.

Dated this 21st day of June, 2024.

14 LEWIS BRISBOIS BISGAARD & SMITH LLP

15 /s/ Jeffrey Winchester

Jeffrey Winchester, Esq.  
16 Nevada Bar No. 10279  
17 6385 S. Rainbow Boulevard, Suite 600  
18 Las Vegas, Nevada 89118  
19 *Attorneys for Defendant Thompson Michie Associates,  
LLC*

20 HOLLAND & HART LLP

21 /s/ Sydney Gambee

Sydney R. Gambee, Esq.  
22 Nevada Bar No. 14204  
23 9555 Hillwood Drive, 2<sup>nd</sup> Floor  
Las Vegas, Nevada 89134  
*Attorneys for Defendant TM Equities, Inc.*

RAFII & ASSOCIATES, P.C.

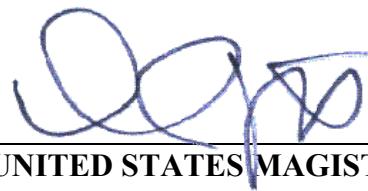
/s/ Jason Kuller

Jason Kuller, Esq.  
Nevada Bar No. 12244  
1120 N. Town Center, Suite 130  
Las Vegas, Nevada 89144  
*Attorneys for Plaintiff*

24 ORDER

25 IT IS SO ORDERED.

26 Dated: 6/25/2024

27  
28   
UNITED STATES MAGISTRATE JUDGE

## **CERTIFICATE OF SERVICE**

2 I hereby certify that, on the date shown file stamped on this pleading, I served a copy of the  
3 foregoing pleading via electronic service in accordance with the Court's order and Local Rules  
4 and that it was served on all parties registered with the Court's CM/ECF system of electronic  
5 service.

J. Kull  
JASON KULLER